

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

**EFRAIN ANTONIO RIVERA SOLER
BRENDA LIZ NIEVES CASTRO**

DEBTORS

CASE # 09-09654 ESL

CHAPTER 11

**REPLY TO MOTION REQUESTING ENTRY OF ORDER FOR IMMEDIATE
PAYMENT**

TO THE HONORABLE COURT:

HERE COMES Debtor through the undersigned attorney and respectfully states and prays:

1. Debtors filed a Chapter 11 petition on November 10, 2009.
2. On January 31, 2011 former debtor's attorney, Enrique M. Almeida Bernal, requested this Honorable Court to enter an order for the immediate payment of the attorney's fees approved by this Honorable Court. (See Docket Entries 188, 189, 197).
3. As part of Debtor's Disclosure Statement and Plan of Reorganization the payment of the attorney's fees was evaluated and proposed as a part of the payment plan. As established on the plan projections, the attorney's fees would be paid through the life of the plan. (See Docket Entries No. 139 & 140; Exhibit C: Income Projections to Disclosure Statement on Docket Entry No. 140).
4. Debtors request to deny Mr. Enrique Almeida's request for the entry of order for immediate payment since, the payment of the attorney's fees, now as a creditor, will be included in Debtor's plan of reorganization.

5. The repayment of the attorney's fees through the plan will be in benefit of the debtor and all the other creditors. The immediate payment of Mr. Almeida's claim would harm other creditors and would affect the plan.
6. Debtors request this Honorable Court to deny Mr. Almeida's request for an order of immediate payment.

WHEREFORE, Debtors request this Honorable Court for an order granting this motion and for any other remedy that in accordance to law deems just and proper.

I HEREBY CERTIFY that a copy of this motion has been electronically filed with the Clerk of the Bankruptcy Court using the CM/ECF system which will send notice of this filing to the following participants: US Trustee Office; and all other parties in interest; and by regular mail to: Enrique Almeida Bernal, Esq., Almeida & Davila, PSC, PO Box 191757, San Juan, Puerto Rico 00919-1757.

In Caguas, Puerto Rico, this 14th day of February of 2011.

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By: /s/ Víctor Gratacós-Díaz (127906)

Isa M. Gratacós- Padró
/s/ Isa M. Gratacós- Padró (221209)